D. LEE KELLER

11 East 8th Street Frederick, Maryland

IN THE CIRCUIT COURT FOR

Plaintiff:

FREDERICK COUNTY, MARYLAND

VS.

EQUITY NO. 24, 420

EVELVN KELLER 515 West C. Street Brunswick, Maryland

Defendant

BILL OF COMPLAINT FOR PARTITION OF REAL ESTATE

PO THE HONORABLE, THE JUDGES OF SAID COURT:

Comes now the laintiff, D. Lee Keller, by and through his attorney, James . Hane, and respectfully represents unto this Court as follows:

- 1. That the Plaintiff is an adult citizen of the United States and a resident of the State of Maryland residing at 14 East 9th Street, Frederick, Maryland.
- 2. That the Defendant, Evelyn Keller, is an adult citizen of the United States and a resident of the State of Maryland residing at 515 lest C Street, Brunswick, Maryland.
- 3. That the parties hereto were married in November, 1939 in Frederick County, Maryland.
- 4. That during the course of their marriage the parties hereto curchased and sold various parcels of real estate in Frederick County, Maryland as tenants by the entirety. That a cursory examination of the Land Records of Frederick County reveal that a complete title examination would have to be made before all of the particular parcels of property now owned by the parties could be identified with particularity. That the Plaintiff believes that it will be necessary for the Trustees to order such a title examination before the property can be offered for sale.

5. That the parties hereto were divorced a vinculo matrimonii